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December 6, 1993



Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W. Room 222  
Washington, D.C. 20554

RECEIVED

CTIA

DEC - 6 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Cellular  
Telecommunications  
Industry Association  
1133 21st Street, NW  
Third Floor  
Washington, DC 20036  
202-785-0081 Telephone  
202-785-0721 Fax

Re: Ex Parte Filing  
PP Docket No. 93-253 (Competitive Bidding)

**Building The  
Wireless Future**

Dear Mr. Caton:

On Monday, December 6, 1993, the Cellular Telecommunications Industry Association ("CTIA") sent the attached letter, transmitting a matrix of the views expressed in the Initial Comments filed by the parties to PP Docket No. 93-253 (Competitive Bidding or Spectrum Auctions), to the FCC staff listed below.

Daniel Abeyta  
Rudy Baca  
Beverly Baker  
Andrew Barrett  
Thomas Beers  
Lauren Belvin  
James Bennett  
Karen Brinkmann  
Kelly Cameron  
John Cimko  
Jonathan Cohen  
Rodney Small  
Randy Coleman  
Robert Corn-Revere  
Diane Cornell  
Ruth Dancey  
Ervin S. Duggan  
Brian Fontes  
Bruce Franca  
David Furth  
Bart Gorman  
Sheldon Guttman  
Ralph Haller  
Jeffrey Hoagg  
John Hollar  
Reed Hundt  
Stevenson Kaminer  
Kimberly King  
Evan Kwerel

Blair Levin  
Kathy Levitz  
Renee Licht  
Byron Marchant  
Steve Markendorff  
Roland Martin  
Geraldine Matise  
Maura McGowan  
Ruth Milkman  
Tom Mooring  
Kent Nakamura  
Linda Oliver  
Myron Peck  
Dr. Robert Pepper  
James Quello  
David Reed  
Jill Ross-Meltzer  
Sarah Siedman  
David Siddall  
Richard Smith  
David Solomon  
Thomas Spavins  
Merrill Spiegel  
Dr. Tom Stanley  
Gerald Vaughan  
Greg Vogt  
John Williams  
John Winston

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Mr. Caton  
December 6, 1993  
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The views expressed in this document reflect CTIA's position as previously filed in these proceedings.

If there are any questions in this regard, please contact the undersigned.

Sincerely,

  
Robert F. Roche

Enclosure

December 6, 1993

Chairman Reed Hundt  
Federal Communications Commission  
1919 M Street, N.W. Room 802  
Washington, D.C. 20554

Re: Ex Parte Filing  
PP Docket No. 93-253  
Competitive Bidding

Dear Mr. Chairman:

Enclosed is a matrix describing the views of the parties to PP Docket No. 93-253, as expressed in their Initial Comments, on the major issues surrounding the auction process.

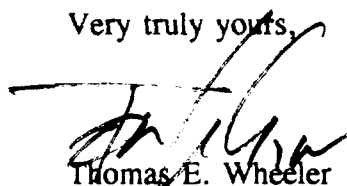
CTIA believes that the record in this proceeding demonstrates that the best method of competitive bidding for PCS is open, English oral auctions. The matrix shows that the overwhelming majority of commentators support this method as the most appropriate and effective means of achieving the Commission's goals.

While not every commentator addressed the concept of combinatorial bidding, most who did express an opinion argued for limiting its application. CTIA believes that to the extent combinatorial bidding is adopted, it should be conducted prior to conducting the open oral auction, allowing bidders to benefit from the information and avoid fruitless bidding, eliminating the need for a supplemental round of oral bidding. To the extent that combinatorial bidding is adopted, it should be limited to geographic aggregation and not applied to spectrum blocks.

Most commentators support rules which will foster greater participation of small, women, minority-owned businesses and rural telephone companies in the auction process, subject to safeguards and qualification requirements.

I hope that the enclosed matrix will be of use to you and your staff in analyzing and adopting the necessary and practical mechanisms for implementing spectrum auctions, fostering the swift deployment of PCS, creating new jobs and investment and providing opportunities for small, rural, women and minority-owned businesses to participate in providing wireless communications services.

Very truly yours,



Thomas E. Wheeler

Enclosure



**CTIA** Cellular  
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**Building The  
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**Thomas E. Wheeler**  
President/CEO

December 6, 1993

Commissioner James H. Quello  
Federal Communications Commission  
1919 M Street, N.W. Room 802  
Washington, D.C. 20554

Re: Ex Parte Filing  
PP Docket No. 93-253  
Competitive Bidding

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Thomas E. Wheeler  
President/CEO

December 6, 1993



Commissioner Andrew C. Barrett  
Federal Communications Commission  
1919 M Street, N.W. Room 826  
Washington, D.C. 20554

Re: Ex Parte Filing  
PP Docket No. 93-253  
Competitive Bidding

**Building The  
Wireless Future**

Thomas E. Wheeler  
President/CEO

Dear Andy:

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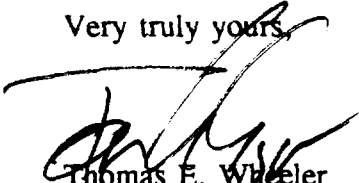
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Thomas E. Wheeler

Enclosure

December 6, 1993

Commissioner Ervin S. Duggan  
Federal Communications Commission  
1919 M Street, N.W. Room 832  
Washington, D.C. 20554

Re: Ex Parte Filing  
PP Docket No. 93-253  
Competitive Bidding

Dear Ervin:

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**Building The  
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**Thomas E. Wheeler**  
President/CEO

December 6, 1993

Dr. Thomas Stanley  
Chief Engineer  
Federal Communications Commission  
2025 M Street, N.W. Room 7002  
Washington, D.C. 20554

Re: Ex Parte Filing  
PP Docket No. 93-253  
Competitive Bidding

Dear Tom:

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Wireless Future**

Thomas E. Wheeler  
President/CEO

December 6, 1993

Dr. Robert Pepper  
Chief, Office of Plans & Policy  
Federal Communications Commission  
1919 M Street, N.W. Room 822  
Washington, D.C. 20554

Re: Ex Parte Filing  
PP Docket No. 93-253  
Competitive Bidding

Dear Bob:

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## **OVERVIEW OF COMPETITIVE BIDDING COMMENTS**

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The enclosed matrix generally describes interested parties' views, expressed in their Initial Comments, on the preferred type or sequence of competitive bidding, whether combinatorial bidding is favored, and whether special rules for Small, Women, Minority businesses, and Rural Telephone Companies ("SWMRs"), and auction safeguards and bidder qualifications are preferred.

By an overwhelming majority, most commenters agree with CTIA that the best method of competitive bidding for personal communications services is open, oral "English"-style bidding. Due to the uncertainty surrounding the concept of combinatorial bidding, many commenters chose to abstain from providing guidance on whether combinatorial bidding will allow for a workable process. Most commenters that expressed an opinion regarding combinatorial bidding agree that if combinatorial bidding is permitted, it should be restricted to the licensing of MTAs. For example, Pacific Telecom Cellular, Small Business PCS Association, and Comcast oppose combinatorial bidding for BTAs. However, others, like MCI and Bell Atlantic, advocate combinatorial bidding for all spectrum blocks.

Southwestern Bell and McCaw strongly oppose combinatorial bidding.

In addition, most commenters support the adoption of special rules that will allow for greater participation by SWMRs in the auction process. However, in order to prevent abuse of the auction process, many are also in favor of safeguards and bidder qualifications. These measures are supported to maximize participation in the PCS auctions, while allowing parties that value licenses the most to best serve the public and make rapid and efficient use of the spectrum.

### SUMMARY OF COMPETITIVE BIDDING COMMENTS

COMMENTER	SEQUENCE OF BIDDING	FAVORS COMBINATORIAL BIDDING	FAVORS SPECIAL RULES FOR SWMRS (SMALL, WOMEN, MINORITY BUSINESS, AND RURAL TELECOM)	FAVORS AUCTION SAFEGUARDS/BIDDER QUALIFICATIONS
Advanced Mobilecomm Tech. and Digital Spread Spectrum (Joint Commenters)	No Position Stated	No Position Stated	Yes	No Position Stated
Allcity Paging, Inc.	No Position Stated	No Position Stated	No Position Stated	Comparative hearing for mutually exclusive Paging applications should be allowed, pursuant to §22.33(c) of FCC Rules
Alliance for Fairness and Viable Opportunity (AFVO)	No Position Stated	No Position Stated	Yes	Urges FCC to establish firm guidelines for companies seeking qualification as "Designated entity"  Anti-trafficking restrictions should not be imposed
Alliance of Rural Area Telephone and Cellular Service Providers	Largest to smallest markets  Auction all frequency blocks within a given market area before proceeding to the next market	Yes, sealed combinatorial bids only for MTAs, followed by oral bidding  No combinatorial bidding for BTAs	Yes	Winning bidder's deposit should be retained, unless good cause is shown for refund
American Automobile Association	No Position Stated	No Position Stated	No Position Stated	Seeks clarification of "private use" definition

COMMENTER	SEQUENCE OF BIDDING	FAVORS COMBINATORIAL BIDDING	FAVORS SPECIAL RULES FOR SWMRS (SMALL, WOMEN, MINORITY BUSINESSES, AND RURAL TELECOM)	FAVORS AUCTION SAFEGUARDS/BIDDER QUALIFICATIONS
American Personal Communications	Sequentially by spectrum block from largest to smallest markets; within each market begin auctioning 30 MHz blocks ("A" and "B"), followed by 20 MHz block ("C") and all 10 MHz ("D" - "G") blocks	Supports combinatorial bidding for BTAs to be aggregated into MTAs, but opposes aggregation of MTAs into national licenses	Yes, seeks clarification that rural telecoms are only eligible for special "set-aside" spectrum blocks where service is currently provided, and cellular/PCS ownership should not apply to in-region rural telecoms.	Anti-trafficking restrictions should not be placed on PCS licenses, comparative hearing is more appropriate forum
AMTA	No Position Stated	No Position Stated	No Position Stated	Competitive bidding should not apply to existing or anticipated private land mobile licenses
American Petroleum Institute	No Position Stated	No Position Stated	No Position Stated	Concurs with the FCC's tentative conclusion that competitive bidding should not apply to radio spectrum used for internal or private use  Supports antitrafficking measures and mechanisms for discouraging speculation

COMMENTER	SEQUENCE OF BIDDING	FAVORS COMBINATORIAL BIDDING	FAVORS SPECIAL RULES FOR SWMRS (SMALL, WOMEN, MINORITY BUSINESSES, AND RURAL TELECOM)	FAVORS AUCTION SAFEGUARDS/BIDDER QUALIFICATIONS
Ameritech	No Position Stated	No Position Stated	No Position Stated	Maintains that the PCS/Cellular exclusion rule should be applicable 6 months after the award of a license, not before. Thus, granting a cellular licensee time to meet the eligibility requirements
John G. Andrikopoulos, <i>et al.</i> (Partnership)	No Position Stated	No Position Stated	No Position Stated	Opposes use of auctions to license cellular unserved areas
Association of American Railroads (AAR)	No Position Stated	No Position Stated	No Position Stated	Railroads use shared spectrum for internal purposes and mutual exclusivity should not exist where channels are shared
Association of Independent Designated Entities	Accept bids for all frequency blocks before proceeding to next area; markets auctioned in declining order of population	No Position Stated	Yes	Eliminate some auction requirements that can be resolved with less restrictive measures, e.g., winning bidder's ability to pay (make duration of auction coextensive with processing of application)
AMSC	No Position Stated	No Position Stated	No Position Stated	Competitive bidding is not appropriate for awarding mobile satellite licenses

COMMENTER	SEQUENCE OF BIDDING	FAVORS COMBINATORIAL BIDDING	FAVORS SPECIAL RULES FOR SWMRS (SMALL, WOMEN, MINORITY BUSINESSES, AND RURAL TELECOM)	FAVORS AUCTION SAFEGUARDS/BIDDER QUALIFICATIONS
American Wireless Communications Corp.	Auction all geographic regions within one spectrum block before proceeding to next region	Yes	Yes	Enforce anti-trafficking, antisham, and collusion provisions
American Women in Radio and Television	No Position Stated	No Position Stated	Yes	No Position Stated
Anchorage Telephone Utility	No Position Stated	No Position Stated	Yes, "Rural Teleco" designation should be consistent with Congressional intent and include municipally-owned telephone companies that are exempt from Federal income tax	No Position Stated
Arch Communications Group	Begin with nationwide licenses (starting with largest bandwidth to most narrowest), proceed to regional licenses utilizing same sequence	No sealed.combinatorial bidding	No Position Stated	Auction process coupled with adoption of strict construction rules for narrowband PCS will prevent abuses

COMMENTER	SEQUENCE OF BIDDING	FAVORS COMBINATORIAL BIDDING	FAVORS SPECIAL RULES FOR SWMRS (SMALL, WOMEN, MINORITY BUSINESSES, AND RURAL TELECOs)	FAVORS AUCTION SAFEGUARDS/BIDDER QUALIFICATIONS
AT&T	Sequential oral ascending bidding	Agrees with FCC proposal to use sealed bids when there are "very few bidders," and bidders should only be allowed to submit one bid	Yes	Upfront payments and lump sum payments should be required for all, with the exception of SWMRs  Bidder-imposed limitations, minimum bids, and anti-collusion rules are not necessary
Bell Atlantic Personal Communications	Limit process to 4 auctions, beginning with Block "A," conduct oral auction for individual geographic locations, open sealed bids, repeating process	Yes	Yes	Due to auction process, no need to impose anti-trafficking requirements (except for SWMRs)  Enforce anti-collusion rules and implement experimental auction design
BellSouth	Open bidding from largest to smallest markets	No	Yes	Special rules against collusion are unnecessary, instead limit settlement remuneration
Berenger, Boyette, Bockorny & Clough, Inc.	No Position Stated	No Position Stated	No Position Stated	FCC should not auction unserved cellular license areas

COMMENTER	SEQUENCE OF BIDDING	FAVORS COMBINATORIAL BIDDING	FAVORS SPECIAL RULES FOR SWMRS (SMALL, WOMEN, MINORITY BUSINESSES, AND RURAL TELECOM)	FAVORS AUCTION SAFEGUARDS/BIDDER QUALIFICATIONS
Cablevision, Comcast, Cox, and Jones Interchange (Joint Parties)	No Position Stated	No Position Stated	No Position Stated	Applications for CARS spectrum are not mutually exclusive and spectrum should not be auctioned
Calcell Wireless, Inc.	Auction MTAs in descending order of population, then proceed to 20 MHz and 10 MHz BTA spectrum blocks in same manner	Yes	Yes; however, each group faces unique challenges and rules should be structured accordingly	No Position Stated
California Microwave (Microwave radio equipment manufacturer)	No Position Stated	No Position Stated	No Position Stated	Intermediate links should not be subject to competitive bidding
California PUC	No Position Stated	No Position Stated	Yes	No Position Stated
CALL-HER, LLC	No Position Stated	No Position Stated	Yes	No Position Stated
Cellular Communications, Inc.	Oral "English"-style bidding of small, similarly sized geographic areas  Begin from East to West, then reverse direction for the next band; suggests increasing 10 MHz to 20 MHz blocks to minimize number of auctions)	Aggregate from BTA to MTA or MTA to national, and use sealed bids for combinations  Sealed bids not necessary to foster aggregation	No Position Stated	Fewer safeguards needed with oral auctions

COMMENTER	SEQUENCE OF BIDDING	FAVORS COMBINATORIAL BIDDING	FAVORS SPECIAL RULES FOR SWMRS (SMALL, WOMEN, MINORITY BUSINESSES, AND RURAL TELECOM)	FAVORS AUCTION SAFEGUARDS/BIDDER QUALIFICATIONS
Cellular Service, Inc. (Cellular Reseller)	MTA "A" and "B" blocks should be auctioned on a random basis after determining by lottery the geographic order, Block "A" should be auctioned first  Block "C" should be subject to lottery to determine sequence, followed by competitive silent bids, follow same process for remaining blocks	Favors Vickery bidding method, but is not opposed to combinatorial bidding if FCC implements set-asides and ownership and bidding limitations	Yes	Yes
Cellular Settlement Groups	No Position Stated	No Position Stated	No Position Stated	FCC should continue to accept full market settlements of contested cellular applications and subject unserved area applications to auction process
CTIA	Conduct sealed combinatorial auction for larger geographic areas within a spectrum block and winning combination before conducting oral "English" auction  Largest to smallest markets	Yes	Yes	Yes, simplify application process to facilitate widespread bidder participation



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Century Comm. Corp.	No Position Stated	No Position Stated	No Position Stated	FCC should determine that direct broadcast satellite ("DBS") frequencies are subject to competitive bidding  CARS licenses should not be subject to auctions
Chickasaw Telephone	No Position Stated	No Position Stated	Yes, FCC should adopt payment plans and resale restrictions designed to encourage investment in rural telecoms PCS systems	Antitrafficking restrictions should not apply to rural telecoms
Citizens Utilities Co.	No Position Stated	No Position Stated	No Position Stated	Rural Teleco eligibility should be clarified to ensure participation  Basic Exchange Telephone Radio Service ("BETRS") licenses should not be subject to auctions
Coalition for Equality in Licensing	No Position Stated	No Position Stated	No Position Stated	Cellular rural service areas and unserved area applications should not be subject to auctions

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<b>Cole, Raywid &amp; Braverman</b>	No Position Stated	No Position Stated	No Position Stated	Auctioning of cellular unserved area applications is contrary to Congressional intent and judicial policy
<b>Comcast Corp.</b>	Sequential ascending bids beginning with MTAs	No (esp. at MTA level), but if FCC persists with combinatorial bidding, it should first be tested at BTA level	No Position Stated	Yes
<b>Comtech Associates</b>	Sealed-bid, second sealed-bid, and Dutch auction	Yes, only for services like PCS where nationwide licenses are more efficient than individual licenses	Yes	Restricting classes of applicants to groups with no economic incentive to warehouse is preferable over performance requirements
<b>Converging Industries™</b>	No Position Stated	No Position Stated	Yes	Disagrees with legal requirement to impose additional regulatory restraints on designated entities, instead of applying universally to all bidders
<b>Council of 100</b>	Oral bidding	No Position Stated	Yes, supports installment payments and SBAC's "innovator bidding preferences"	Yes

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Cook Inlet Region, Inc.	No Position Stated	No Position Stated	Yes, but proposed set-aside is inadequate	Yes, supports lump sum payments for all and 2-year anti-trafficking restriction
Corporate Technology Partners	Oral bidding for set-aside bands  Sequential from largest to smallest according to population size, and blocks "E," "F," and "G" bands auctioned before "D" BTA bands	No Position Stated	Yes	FCC should adopt rules against collusion  Transfer of "C" and "D" bands should not be restricted  Upfront payments should be returned to small businesses if over 10% of winning bid
Cox Enterprises, Inc.	Auction MTAs before BTAs	No Position Stated	No Position Stated	CARS and point-to-point microwave services should not be auctioned
Domestic Automation Co. (Multiple Address System manufacturer)	No Position Stated	No Position Stated	No Position Stated	Supports private services exemption from auction process  Urges FCC to promulgate stern anti-trafficking rules
Duncan, Weinberg, Miller & Pembroke, P.C. (law firm)	Oral bidding proposal should be re-examined in light of different positions of entities	No Position Stated	Yes, requests SWMRs treatment for local governmental entities	Yes

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Economics and Technology, Inc.	No Position Stated	No Position Stated	Yes, physically challenged persons should be included in definition of "minority," pursuant to Americans with Disabilities Act	Yes
Federal Reserve Board Division of Research and Statistics, and Division of Money Affairs	Open auction, conducted via "real-time," automated network with repeated bidding	No Position Stated	No Position Stated	To end price discrimination and encourage greater participation in auctions, charge single price for entity
First Cellular of MD.	No Position Stated	No Position Stated	Yes	Cellular unserved areas should not be auctioned; however, expedite treatment utilizing whatever form of treatment FCC deems appropriate
General Communications	Smallest MTA to largest	Yes, for blocks "A" and "B", from BTA level to single MTA level for each block  Blocks "C" - "G" sequentially auctioned	Yes	Yes
GVNW Management	No Position Stated	No Position Stated	Yes	Yes

<b>COMMENTS</b>	<b>SEQUENCE OF BIDDING</b>	<b>FAVORS COMBINATORIAL BIDDING</b>	<b>FAVORS SPECIAL RULES FOR SWMRs (SMALL, WOMEN, MINORITY BUSINESSES, AND RURAL TELECOM)</b>	<b>FAVORS AUCTION SAFEGUARDS/BIDDER QUALIFICATIONS</b>
<b>Hughes Communications Galaxy and DirecTV (Fixed satellite and DBS licenses)</b>	No Position Stated	No Position Stated	No Position Stated	Competitive bidding should not apply to fixed satellite or Direct Broadcast Satellite licenses
<b>Hughes Transportation Management Systems</b>	No Position Stated	No Position Stated	No Position Stated	Agrees with tentative decision to exclude Automatic Vehicle Monitoring ("AVM") from competitive bidding process
<b>Independent Cellular Consultants</b>	Oral bidding should not be used for Interactive Video and Data Service ("IVDS") licenses  Sequential bidding in descending order for each 734 IVDS market	No Position Stated	Yes, supports sealed bids, royalty payments and dispensation from "up-front" auction payments for SWMRs	Opposes decision to subject to auction IVDS licenses
<b>Industrial Telecomm. Assoc.</b>	No Position Stated	No Position Stated	No Position Stated	Agrees with FCC's decision not to subject private radio service licenses to auction process
<b>Iowa Network Services</b>	No Position Stated	No Position Stated	Yes, favors tax certificates and alternative payment plans for SWMRs	Yes

COMMENTER	SEQUENCE OF BIDDING	FAVORS COMBINATORIAL BIDDING	FAVORS SPECIAL RULES FOR SWMRs (SMALL, WOMEN, MINORITY BUSINESSES, AND RURAL TELECOM)	FAVORS AUCTION SAFEGUARDS/BIDDER QUALIFICATIONS
IVHS America	No Position Stated	No Position Stated	No Position Stated	Urges Commission to exempt "mixed-use" Intelligent Vehicle Highway Service ("IVHS") licenses from auction process
Andrea Johnson	No Position Stated	No Position Stated	Yes	Urges Commission to exempt IVHS licenses from auction process; consider issue in separate rulemaking
Edward M. Johnson	No Position Stated	No Position Stated	Yes, proposes that auction bid for SWMRs be limited to royalty fee (e.g., 30-60% percent of gross operating profits)	Prevent collusion by relaxing "up-front" payment to \$10,000 flat refundable deposit
E.F. Johnson Co. (radio equipment manufacturer)	No Position Stated	No Position Stated	Yes	Yes
JMP Telecom Systems	No Position Stated	Opposes oral bidding  Prefers electronic or sealed bidding	Yes: award one set of license for large firms, and another set of licenses in same market with identical bandwidth for SWMRs, utilizing alternative financing measures	Yes

COMMENTER	SEQUENCE OF BIDDING	FAVORS COMBINATORIAL BIDDING	FAVORS SPECIAL RULES FOR SWMRS (SMALL, WOMEN, MINORITY BUSINESSES, AND RURAL TELECOM)	FAVORS AUCTION SAFEGUARDS/BIDDER QUALIFICATIONS
Abraham Kye, <i>et al.</i>	No Position Stated	No Position Stated	No Position Stated	Opposes use of auctions to license cellular unserved areas
Ward Leber, Eroca Daniels, <i>et al.</i> (Partnership)	No Position Stated	No Position Stated	No Position Stated	Opposes use of auctions to license cellular unserved areas
Liberty Cellular	Auction all frequency blocks in an MTA before proceeding to the next MTA, beginning with the largest to the smallest market	Opposes combinatorial bidding for BTAs, but supports proposal for MTAs	Yes, suggests 2 qualifying limitations on applications of minorities and women: 1) 50.1% control; and 2) comply with financial limitations imposed on small businesses  Benefits for designated entities should apply across-the-board in all markets	Yes
Loral Qualcomm Satellite Services (Mobile Satellite applicant)	No Position Stated	No Position Stated	No Position Stated	Urges that auctions are unnecessary because no finding of mutual exclusivity is required
Robert Lutz, <i>et al.</i>	No Position Stated	No Position Stated	No Position Stated	Opposes the use of auctions to license cellular unserved areas

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Maximum Television Service Association ("MTSV") and National Association of Broadcasters ("NAB") (Joint Comments)	No Position Stated	No Position Stated	No Position Stated	Urges that the FCC ensure that any standard adopted for "mixed use" services does not impose competitive bidding requirements on broadcasters
McCaw Cellular Communications	<p>Oral bidding</p> <p>First auctions should address narrowband PCS, followed by cellular unserved areas</p> <p>For broadband PCS begin with largest populated markets to smallest markets, starting with MTAs sequentially by spectrum blocks</p>	No	Yes	Yes
MCI	Conduct sealed bids then conduct oral bids in for "A," and "B" MTA blocks; if combination bids wins in either band, entity may withdraw any MTA winning bands in the other band	Yes, on nationwide level of MTAs and combination of 10 MHz ("E," "F," and "G") blocks using sealed second-bid auctions	Yes	Yes



COMMENTER	SEQUENCE OF BIDDING	FAVORS COMBINATORIAL BIDDING	FAVORS SPECIAL RULES FOR SWMRS (SMALL, WOMEN, MINORITY BUSINESSES, AND RURAL TELECOM)	FAVORS AUCTION SAFEGUARDS/BIDDER QUALIFICATIONS
<b>MEBTEL</b> (Rural Telephone Exchange Co.)	No Position Stated	No Position Stated	Yes, proposes that the 50,000 access lines be the demarcation for "Rural Teleco" classification  Proposes that "Women" and "Minority" classification should apply only if business is classified as Small Business or as a Rural Teleco	Yes
<b>Mercury Cellular Communications</b>	No Position Stated	Yes, with SWMRs	Yes	Yes
<b>Law of Richard S. Meyers</b>	Sealed bidding	No Position Stated	Yes	Yes
<b>Millin Publications</b>	No Position Stated	No Position Stated	Yes	Urges FCC not to limit PCS to subscription service because non-subscription based PCS will more fully promote Budget Act's objectives
<b>Minnesota Equal Access Network Services</b>	Begin with BTAs within MTAs, then proceed to MTAs	No Position Stated	Yes, Block "C" should be set aside for Rural Telephone companies	Yes